

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>In Re:</b>	)	<b>In Proceedings Under</b>
	)	<b>Chapter 13</b>
<b>Anthony and Amanda Tobben,</b>	)	
	)	<b>Case No. 19-46764</b>
<b>Debtor/Movant,</b>	)	
	)	

**DEBTOR'S MOTION TO REINSTATE**

Comes Now Anthony and Amanda Tobben, Debtors herein, by and through yher attorney of record, Angela Redden-Jansen, and for their Motion states as follows:

1. Debtors filed for relief under Chapter 13 if the United States Bankruptcy Code on October 27, 2019.
2. Debtors' case was dismissed on December 12, 2019 for failure to make plan payments.
3. Debtors tendered sufficient funds to become current to the Trustee on December 20, 2019. Attached hereto as Exhibit 1 is proof of funds.
4. No party in interest will be harmed if Debtors' case is reinstated.
5. Debtors will be irreparably harmed if their case is not reinstated.

WHEREFORE, Debtors pray that this court enter an order granting their Motion reinstating their case and for such other and further relief as the court deems just and proper under the circumstances.

RESPECTFULLY SUBMITTED,

/s/ Angela Redden-Jansen  
Angela Redden-Jansen, 85064  
Attorney for Debtor  
3350 Greenwood Blvd.  
Maplewood, MO 63143  
314.645.5900  
amredden@swbell.net

Certificate of Service

The undersign hereby certifies that on this 25<sup>th</sup> day of December, 2019 a copy of the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Chapter 13 Trustee.

/s/ Angela Redden-Jansen